

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

In Re:)	
)	Case No. 22-42958-659
Deborah Lee Meeks)	
)	Chapter 13
)	
Debtor.)	OBJECTION TO CLAIM NO: 3
)	CLAIMANT: US Bank Trust National
)	Association (Rushmore Loan
)	Management Services, LLC)
)	

OBJECTION TO CLAIM AND NOTICE
WITH NOTICE OF TWENTY-ONE DAY OBJECTION PERIOD

WARNING: THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. THE DATE OF WHICH WILL BE SENT TO YOU IF YOU FILE A RESPONSE. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEYS.

COMES NOW Debtor, by counsel, and for her objection to claim states as follows:

1. On October 20, 2022, US Bank Trust National Association (Rushmore Loan Management Services, LLC) filed a proof of claim in the amount of \$169,260.32, for a loan against Debtor's residence located at 1337 Twin Trails Court, Fenton, Missouri 63026.
2. The claim filed by US Bank National Association lists arrearage owed in the amount of \$40,530.06.
3. Debtor participated in the Homweowners Assistance Fund through the State Assistance for Housing Relief for Homeowners program (SAFHR) in which she was

approved to receive \$43,436.11 to be paid directly to Rushmore Loan Management Services.

4. Per the monthly mortgage statement Debtor received from Rushmore Loan Management Services that was issued on February 10, 2023, funds in the amount of \$43,436.11 were credited to Ms. Meek's mortgage account.

5. Debtor objects to claim number 3 and further states the claim for arrearage by US Bank National Trust (Rushmore Loan Management Services) should be amended to reflect the arrearage as being cured.

Therefore, said claim for arrearage should be denied and US Bank Trust National Association required to amend said proof of claim.

Respectfully submitted,
ROSENTHAL & RINGLING

BY: /s/ Jeffrey L. Ringling
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The undersigned hereby certifies that a true and correct copy of the foregoing document was filed electronically on this 22nd day of March, 2023 with the United States Bankruptcy Court and has been served on the parties in interest via email by the Court's CM/ECF System as listed on the Court's Electronic Mail Notice List and has also been served by Regular United States Mail Service, first class, postage fully pre-paid, addressed to those parties listed on the Court's Manual Notice List and listed below:

Creditor:
Rushmore Loan Management Services, LLC
P.O. Box 55004
Irvine, CA 92619-2708

Debtor:
Deborah Meeks
1337 Twin Trails Court
Fenton, MO 63026

The undersigned hereby certifies that a true and correct copy of the foregoing document was filed electronically on this 22nd day of March, 2023 with the United States Bankruptcy Court and has been served on the following Insured Depository Institution pursuant to Fed. R. Bankr. P. 7004(h), or on the United States, or any of its officers or agencies pursuant to Fed. R. Bank. P. 7004(4) or (5) by certified mail address to those parties listed below:

Wells Fargo Bank, N.A.
C/O Terry Smith, CEO
15480 Laguna Canyon Road, Ste 100
Irvine, CA 92618

/s/ Jeffrey L. Ringling
Jeffrey L. Ringling, Attorney

3/22/23
Dated